

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

**NORTHEAST UTILITIES SERVICE
COMPANY APPLICATION TO THE
CONNECTICUT SITING COUNCIL
FOR A CERTIFICATE OF
ENVIRONMENTAL COMPATIBILITY
AND PUBLIC NEED (“CERTIFICATE”)
FOR THE CONSTRUCTION OF A
NEW 345-KV ELECTRIC TRANSMISSION
LINE FACILITY AND ASSOCIATED
FACILITIES BETWEEN SCOVILL
ROCK SWITCHING STATION IN
MIDDLETOWN AND NORWALK
SUBSTATION IN NORWALK, INCLUDING
THE RECONSTRUCTION OF PORTIONS
OF EXISTING 115-KV AND 345-KV
ELECTRIC TRANSMISSION LINES,
THE CONSTRUCTION OF BESECK
SWITCHING STATION IN
WALLINGFORD, EAST DEVON
SUBSTATION IN MILFORD, AND
SINGER SUBSTATION IN BRIDGEPORT,
MODIFICATIONS AT SCOVILL ROCK
SWITCHING STATION AND NORWALK
SUBSTATION, AND THE
RECONFIGURATION OF CERTAIN
INTERCONNECTIONS**

DOCKET NO. 272

APRIL 7, 2004

**PRE-HEARING QUESTIONS TO THE
CONNECTICUT LIGHT AND POWER COMPANY AND THE
UNITED ILLUMINATING COMPANY
FROM WOODBRIDGE AND MILFORD**

SET ONE

The Town of Woodbridge and the City of Milford (the “Towns”) submit the following Pre-Hearing Questions (Set One) to The Connecticut Light and Power Company and the United Illuminating Company (the “Applicant”) in connection with the Application to the Connecticut Siting Council for a Certificate of Environmental Compatibility and Public Need for for the construction of a new 345-kV electric transmission line facility and associated facilities between Scovill Rock Switching Station in Middletown and Norwalk Substation in Norwalk, including the reconstruction of portions of existing 115-kV and 345-kV electric transmission lines, the

construction of Beseck Switching Station in Wallingford, East Devon Substation in Milford, and Singer Substation in Bridgeport, modifications at Scovill Rock Switching Station and Norwalk Substation, and the reconfiguration of certain interconnections (the "Application"). Woodbridge and Milford request that the Applicant respond on or before *April 22, 2004*.

1. With respect to Woodbridge and Milford, identify each person who you expect to call as an expert witness at the hearings before the Siting Council in connection with the identification of ecological, natural, recreational, historical, archeological and scenic resource values of the proposed transmission line set forth in the Application and its impact thereon. With respect to each such witness:
 - (a) state the subject matter on which the expert is expected to testify;
 - (b) state his or her qualifications as an expert with respect to the identified subject matter, including a list of all publications authored by the witness within the preceding ten years, and provide a copy of his or her curriculum vitae;
 - (c) provide a complete statement of all opinions to be expressed and the basis and reasons therefor;
 - (d) identify the data or other information considered by the witness in forming his or her opinions;
 - (e) identify any exhibits to be used as a summary of or as support for the opinions;
 - (f) identify all cases or administrative hearings during which the witness testified as an expert within the preceding four years;
 - (g) state the compensation paid or to be paid for the witness' study and testimony; and
 - (h) provide copies of any retainer agreements or letters of engagement for each expert, and documents concerning (c)(d) and (e) above.

2. With respect to Woodbridge and Milford, identify any person or entity who consulted with or provided information to the Applicant on issues relating to the identification of ecological, natural, recreational, historical, archeological and scenic resource values of the proposed transmission line set forth in the Application.

3. With respect to Woodbridge and Milford, identify any person or entity who consulted with or provided information to the Applicant on issues relating to the impact on ecological, natural, recreational, historical, archeological and scenic resource values as a result of the proposed transmission line set forth in the Application.
4. With respect to Woodbridge and Milford, identify any person or entity who consulted with or provided information to the Applicant on issues relating to the identification of ecological, natural, recreational, historical, archeological and scenic resource values of any alternative route to the proposed transmission line set forth in the Application.
5. With respect to Woodbridge and Milford, identify any person or entity who consulted with or provided information to the Applicant on issues relating to the impact on ecological, natural, recreational, historical, archeological and scenic resource values as a result of any alternative to the proposed transmission line set forth in the Application.
6. Please provide all documents (including without limitation all internal or external memos, maps, reports, notes, field notes, surveys, studies, drafts, correspondence) of any of the persons or entities identified in response to questions # 1 through 5 above.
7. With respect to Woodbridge and Milford, please provide all documents (including without limitation all internal or external memos, maps, emails, reports, notes, field notes, surveys, studies, correspondence, minutes or records of board or committee meetings) relating to, referring to, describing, evidencing or constituting the following:
 - a. The scenic resource values of the Towns in and around the area of the proposed overhead 345 kv transmission line.
 - b. The impact on the scenic resource values identified in response to the preceding question.
 - c. The historical resource values of the Towns in and around the area of the proposed overhead 345 kv transmission line.
 - d. The impact on the historical resource values identified in response to the preceding question.
 - e. The archeological resource values of the Towns in and around the area of the proposed overhead 345 kv transmission line.
 - f. The impact on the archeological resource values identified in response to the preceding question.

14. With respect to Woodbridge and Milford, will improvements to access roads through wetlands remain in-place to provide permanent pole access, or will access roads be removed and wetlands restored?

15. Volume 1 Section J.1.6 states that pulling sites are 50-75 feet wide by 100-200 feet long. Section K.3 states that pulling sites are about one acre in size. Which one should be used to estimate the area of disturbance?

16. With respect to Woodbridge and Milford, could existing poles within wetlands be cut by hand and dropped leaving only the foundation in place to reduce wetland impacts? If so, would this significantly reduce the area of impact to wetlands?

17. Are conductor pulling sites required at all angle points in the existing right of way? If so, is one required at Pease Junction in Woodbridge? If not, can the pulling site located northeast of Rimmon Road in Woodbridge be relocated outside of the wetland?

TOWN OF WOODBRIDGE

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